

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION

For Dominick Pugliese)
Plaintiff/Movant)
)
-v-) Case No. 1:15-cr-182-01
)
UNITED STATES OF AMERICA)
Defendant/Respondent)
)

28 U.S.C. § 2242 (next friend) Request for
Habeas Corpus, Compassionate
Immediate Release Under CARES Act

COMES NOW petitioner, Donna Watts, and enters this motion requesting immediate relief under habeas corpus, FIRST STEP ACT, SECOND CHANCE ACT, and most recently the CARES ACT.

Petitioner submits to this court he/she meets the two requirements that must be satisfied in order for such standing to be granted.

First petitioner asserts the defendant does not have reasonable accessibility to the courts, is currently under extreme duress and thus mentally incompetent and a combination of other factors contribute to the reasons why the real party in interest cannot appear on his own behalf to prosecute this action. See e.g., United States ex rel. Tofh v. Quarles, 350 U.S. 111, 13 n.3, 76 S.Ct 1 100 L.Ed 8 (1955) (habeas petition brought by sister on behalf of civilian prisoner held in military prison in Korea); Massie ex rel. Kroll v. Woodford, 244 F.3d 1192, 1196 (9th Cir 2001).

Petitioner most respectfully posits that the defendant is in a military prison at Fort Dix Joint Base in violation of the Constitution. Under the FSA a "Loved One" is authorized to file such a motion on behalf of the defendant.

Defendant suffers from the following conditions: Asthma, as a result from a collapsed lung in 2005, and High Blood Pressure.

Petitioner respectfully request Plaintiff to be designated to Home Confinement. Attorney General Barr has authorized such an action under the CARES Act, elaborating that Home Confinement is not a release from sentence but a cautionary compassionate measure to curb the spread and eliminate the possibility of a lengthy sentence becoming an effective death sentence.

CERTIFICATE OF SERVICE

I, Donna Watts, do declare under the penalty of perjury according to the course of Common Law that a true and correct copy of:

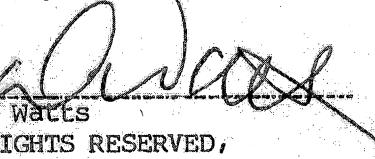
28 U.S.C. for § 2242 (next friend) Request for
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was mailed to:

Ronald Regan Federal Building
c/o Clerk of Court
228 Walnut Street
Harrisburg, PENNSYLVANIA [near 17108-9998]

by United States Postal 3-day prepaid mailing service on this 5/20/20 day of
May, 2020.

Respectfully Submitted,

By: 

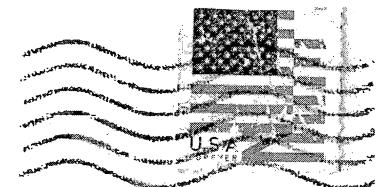
Donna Watts
ALL RIGHTS RESERVED,
Without Prejudice

c/o Donna Watts
67-45 Kissena Blvd.
Flushing, NY [near 11367]
APT-1B

Donna Watts
67-45 Kissena Blvd.
Flushing, NY [near 11367]
APT-1B

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Ronald Reagan Federal Building
220 Walnut Street
Harrisburg, PENNSYLVANIA [near 17108-9996]

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